

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	
)	
Former Nextel Communications, Inc.)	WT Docket No. 06-169
Upper 700 MHz Guard Band Licenses)		
and Revisions to Part 27 of the)		
Commission's Rules)	
)	
Development of Operational, Technical)		WT Docket No. 96-86
And Spectrum Requirements for Meeting)		
Federal, State and Local Public Safety)		
Communications Requirements Through)		
the Year 2010)	

**Motion for Extension of Time
for Submission of Comments to NPRM (FCC 06-133)**

Submitted by:
Gregory J. Urban
Director, Networks Division
State of Maryland
Department of Budget and Management
45 Calvert Street
Annapolis, Maryland 21401-1907

October 20th, 2006

On the 8th of September, 2006, the Commission released the *Notice of Proposed Rule Making (NPRM)*. This NPRM requested comments on possible changes to the Part 27 service rules applicable to existing and prospective Upper 700 MHz Guard Bands licenses that may provide greater technical, operational and regulatory flexibility to licensees in the Guard Bands, while maintaining adequate protection for public safety operations in the adjacent 764-776 and 794-806 MHz bands.

We recognize the benefits of allocating more spectrum for public safety agencies operating in the 700 MHz band and understand this plan would increase the amount of spectrum available for public safety use and provide for more efficient utilization of the spectrum. However, we have not performed a thorough analysis of this plan nor studied the impact it would have on our current 700 MHz projects, including the Statewide Wireless Interoperability Requirements and Proof of Concept Project currently underway. The impact of the changes proposed in this plan could cause delays in our planning, funding, and deployment of future 700 MHz public safety communication systems, as well as increase the cost of planning, development, and deployment of existing 700 MHz Public Safety System projects.

We would welcome an opportunity to join in the discussions about the cost and benefits of this plan and its impact on our existing 700 MHz projects. We believe a thorough analysis of the complex issues is required to formulate an intelligent position on the proposal. The State of Maryland has expended valuable resources in the development of 700 MHz public safety communication systems to date. We therefore seek a short extension of time of 30 days so we could therefore review this plan, establish a position, and submit our comments back to the Commission.

Sincerely,

Gregory J. Urban

Director, Networks Division

State of Maryland

Dept. of Budget and Management